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August 31, 2023

## Via ECF and E-Mail

Honorable Ronnie Abrams United States District Judge United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re:

United States v. Christopher Smith

22 Cr. 685 (RA)

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

September 1, 2023

Dear Judge Abrams:

As Your Honor is aware, I was appointed counsel to Mr. Christopher Smith in the above-referenced matter, appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. §3006A. This correspondence is to respectfully request a six-week extension of time to submit a letter responsive to the Court's direction.

The Court will recall that on June 21, 2023, I was appointed to represent Mr. Smith, and the Court directed that I consult with Mr. Smith and submit a letter advising the Court of how he would like to proceed in this matter. After the Court previously granted a time-extension, my letter to the Court is presently due on or before September 5, 2023. For the reasons set forth herein, I now respectfully request another six-week extension of time.

Since my appointment to this matter, I have reviewed the discovery materials and I have met with Mr. Smith multiple times to: review his case with him; assess his circumstances and options; and answer his questions regarding his guilty plea, sentencing exposure, as well as questions about the law and procedure involved in his case, among other things. As of the time of this writing, Mr. Smith is still undecided and we respectfully request an adjournment, so that I may continue to review the voluminous discovery mate-

rials in this matter and continue to meet with Mr. Smith to address his questions and concerns.

Based upon my communications with A.U.S.A. Amanda Weingarten, the government consents to this request for adjournment.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application and extend the time for submission of my letter to October 23, 2023, or any time thereafter convenient to the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc: A.U.S.A. Amanda Weingarten (via email)